OSHA's Analysis of ETS

P. 3: *'dose limits' that would eliminate significant risk."*

What is the industry's position to determine ETS exposure?

P. 4: *The data from 13 other available studies*

These studies should be cited!

P. 6: *Many have never been tested in an inhalation system.*

No relevant critic.

P. 8: *(Epidemiologic 2-naphtylamine)*

No relevant information.

P. 8: Any human lung carcinogenes among "list of 43" compounds?

P. 9: *Studies indicate ... or mainstream smoke.*

No comparison to SS possible (no undiluted SS!)

P. 9-10: *Concentrations of ETS ... air monitors.*

Detection limits have no toxicol. relevance.

P. 10: Studies based ... situation.

garbled?

Table I: Typical concentration and PELs, TLVs, would be helpful

P. 13: *Where OSHA to apply ... level.*

ETS as complex mixture can have a toxicity and a PEL independent of its components.

Table II: What are typical ETS concentrations?
Are dimethylhydracine and nitropropane, vinylchlorid in ETS?

Table III: I zinc stearate in ETS?

P. 14: *100 to 1000 times greater*

Proof? can this be proven?

P8:
Begründung
"in low and variable amounts"
"Developing an appropriate biomarker for ETS associated PAHs is complicated of"

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Source: https://www.industrydocuments.ucsf.edu/docs/smdc0003

P.17: 77% of males ... respectively
Wrong citation 59 Fed Reg. 15989

P. 19: *and therefore cannot serve as a basis ...*

It may serve to estimate maximum but not average exposure.

P21: how many non smokers are exposed how long how concentrated

P. 25: *Average levels of particles that are about 22 µg/m³ of restaurants report levels that are 42 µg/m³ higher,*

This is significantly lower than exposure assumed by EPA, but not so different from OSHA's claim (18 to 95 µg/m³).

P. 25: *was 46 µg/m³, compared with an average of 20 µg/m³ for 254 non smoking offices*

The level in non smoking offices is surprinsingly high! What was determined (RSP, UVP)?

P. 26: *than those suggested in OSHA's proposed rule.* ? Entspricht Daten in Wohnungen

What figures are referenced?

P. 27: *With the exception of nicotine, none of the substances used as markers ...*

UVPM, FPM, Solanesol are more or less cig./smoke specific.

P. 27: *is characteristic of tobacco smoke in the ambient air, it represents ...* ?

only true for ETSI

P28: "Cig. equivalent" dose od. exposure?

P. 31: *... and inconsistent with actual*

Because no concentrations are reported, they cannot be inconsistent. Only the results can be not plausible. ? estimates

P. 32: *The question used in epidemiologic ...*

Only true for these studies, not true for IARC. studies

P. 32: epidemiologic studies do not measure actual ETS ... Those under investigation did not, but it could be alone

P 36: Seven major studies and two major reviews.. Citation

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Source: https://www.industrydocuments.ucsf.edu/docs/smdc0003